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ABSTRACT

Thirty Comprehensive Employment and Training Act (CETA) programs, selected because of high Hispanic population or because community groups had reported inequitable services, were reviewed to determine whether women and Hispanics received equitable services. Data indicate that many programs failed to: meet their participation and employment placement goals for Hispanics and women, and ensure adequate representation of Hispanics and women on Employment and Training Advisory Councils. Programs also (1) utilized inadequate data bases to determine target groups and fund distribution: (2) showed inconsistency in insuring employment training to needy persons: (3) showed inconsistency in determining CETA service levels to eligible populations, resulting in decreased services to Hispanics and women: (4) failed to develop non-tradional training programs for women, placing women in lower paying, traditionally female occupations: (5) underserved women and Hispanics in CETA Training and Public Service Employment Programs: (6) overserved veterans in CETA programs: (7) underserved persons of Limited English Speaking Ability: and (8) showed political and economic biases in determining program focus, which caused disadvantages to Hispanics and women. Recommendations were made concerning data bases, target groups and significant segments, non-traditional training, services to veterans, and economic/political factors. The 30 programs were ranked by unmet planned goals. (CM)

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CETA:

SERVICES TO HISPANICS AND WOMEN

Summary Report
July, 1980

A Report by the Chicana Rights Project
of the
Mexican American Legal Defense and Educational Fund

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MALDEF's Chicana Rights Project is an in-house project focusing on the specific problems of Chicanas who face the double burden of sex and ethnic origin discrimination. The project is designed to combat the problems of unequal opportunities for Chicanas primarily in the areas of employment, education, health and housing. The CRP has three components: litigation, research and community education.

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SERVICES TO HISPANICS AND WOMEN

July, 1980

Chicana Rights Project
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CETA:

SERVICES TO HISPANICS AND WOMEN

The Comprehensive Employment and Training Act (CETA) [1/] was developed in 1973 to provide a new up-to-date charter for several manpower programs previously operating under the authority of various federal statutes. CETA eliminated the numerous categorical programs and substituted a decentralized and decategorized program that could be more responsive to local needs.

Pursuant to federal mandate and policy, the overall design of CETA provides for maximizing the employment opportunities of those persons most in need and enhancing their economic self-sufficiency. CETA's potential for ultimate impact on Hispanics and women's skill training needs should be very real. Unfortunately, many CETA programs have persisted in being non-responsive to Hispanics' and womens' employment needs.

This report, prepared by MALDEF's Chicana Rights Project, reviews thirty CETA programs (prime sponsors) throughout the

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1/ CETA was enacted December 28, 1973, Pub.L. 93-203, 87 stat. 839. It was amended by Pub.L. 93-567, 88 stat. 1845 (December 31, 1974), as amended by Pub.L. 95-524, 92 stat. 1909 (April 13, 1979).

United States. [2/] The targeted prime sponsors were selected because of their high Hispanic population or, in some cases, because community groups had contacted MALDEF regarding inequitable services in the CETA programs. MALDEF reviewed the 30 prime sponsors' Master and Annual Plans [3/] and 1979 year-end statistics to determine whether women and Hispanics were receiving equitable CETA services. Our conclusion is that many of these prime sponsors have failed to meet their own participation and employment placement goals for Hispanics and women. Further, many of these prime sponsors have failed to ensure that Hispanics and women are adequately represented on prime sponsors' Employment and Training Advisory Councils (ETAC). For example, of the 11 CETA programs reviewed in Texas:

-- All (100%) were deficient in the representation of women on the ETACs which recommend the types of services funded with CETA monies.

-- All (100%) were deficient in participation and/or job placement services for women or Hispanics in the Title IV Youth Community Conservation Improvement Program (YCCIP).

2/ The 30 targeted prime sponsors are listed in Appendix I of this report.

3/ As a condition of receiving federal funds under CETA, prime sponsors must submit a master plan outlining long term goals and implementing employment and training programs and an annual plan setting forth what types of services will be provided to which parts of the population during the fiscal year.

-- All (100%) were deficient in the operating plans regarding specific procedures which will lead to skill development and job opportunities for participants in non-traditional demand occupations.

-- Ten (91%) were deficient in their service levels established for women or Hispanics in Title VI Public Service Employment programs.

Of the 13 CETA programs reviewed in California:

-- All (100%) were deficient in the representation of women on the ETACs which recommend the types of services funded with CETA monies.

-- Twelve (92%) were deficient in participation and/or job placement services for women or Hispanics in the youth employment program (YCCIP).

-- Eight (62%) were deficient in their service levels established for women or Hispanics in Title IID Public Service Employment programs.

It is most surprising that the Department of Labor (DOL), although responsible for administering CETA programs, continues to fund programs that are in noncompliance with federal regulations and cannot meet their own targeted training and placement goals for women and Hispanics. It is indeed unfortunate that many of the CETA programs reviewed herein continue to exclude or limit women and Hispanics from training and employment programs

that could maximize their employment opportunities.

The following report discusses broad problem areas identified during our review and concludes with recommendations for improved CETA services to Hispanics and women.

1. Prime sponsors utilize inadequate data bases to determine which groups are "significant segments" and how funds are distributed to these target groups.

Prime sponsors' planning documents set out the structure for delivery of CETA services within a given geographical area. An important part of the CETA plan is providing a data base outlining the population demographics of the service area in order to identify target groups and to provide "equitable" services to those most in need of the services. MALDEF found, however, that most prime sponsor planning documents base their programs on incomplete and inconsistent data for determining how funds should be distributed.

The initial interest of this project was to examine how effectively CETA was addressing the needs of Hispanic women. The unrefined nature of the data compiled by local prime sponsors made analyzing the level of services to Hispanic women very difficult since there was no breakdown of CETA enrollees by race and sex, only by race or sex. For purposes of this evaluation, therefore, we are assuming that the problems faced by women and Hispanics in CETA training programs are shared by Hispanic women. In truth, however, Hispanic women suffer the double burden of sex and national origin discrimination. They are also more heavily

represented in the CETA eligible population than are non-minority women. [4/] Moreover, the training needs and labor force participation of Hispanic women have increased steadily in recent years. [5/] In order to properly address the service needs of Hispanic women in the future, it is imperative that the Department of Labor require a breakdown by race and sex in the compilation of CETA Quarterly Summaries of Participant Characteristics (QSPCs).

Other major deficiencies in data bases recurrent in prime sponsor plans include:

-- Census data, which is the major source of information to most prime sponsors, reflects severe undercounts of minorities.

-- Prime sponsors' use of aggregate Standard Metropolitan Statistical Area (SMSA) population figures makes targeting services to appropriate groups difficult in rural areas and may result in underservice of women and Hispanics. [6/]

4/ For example, "in 1976, women headed 21% of Hispanic families compared to 11% of white female-headed families. In 1977, over half the families headed by Hispanic females lived on an income below the poverty level as compared to approximately one-third of the families headed by white women and one-tenth of families for the total population." (from "Hispanics and the Department of Labor, Position Paper for Dr. Ray Marshall," Research Division of SER-Jobs for Progress (Aug. 79)).

5/ Vernon M. Briggs, Jr., Walter Fogel, and Fred H. Schmidt, The Chicano Worker (Austin, 1977), p. 21.

6/ When one rural Prime Sponsor, Tulare County, Ca., contracted for updated and refined data from a private source, the results showed a significant increase in the proportion of women and Hispanic eligibles.

-- Although CETA regulations identify persons of limited English speaking ability (PLESA) as a target group to be served, there is no definition of what constitutes a "PLESA" nor do most plans include a data base for assessing the population and needs of this group.

-- Although provision of services to veterans is an identified priority in most plans, very little data is offered in the plans to identify the needs or justify high service levels to this group.

-- Most plans lack data on Hispanic unemployment, an important indicator in assessing the needs and program service levels to target groups. 7/

7/ Congress, in drafting legislation for federally funded employment and training programs to reduce unemployment, specifically noted the need for special employment and training programs to take Hispanic "cultural circumstances into consideration." (CETA Legislative History). However, because there is an absence of data on Hispanic unemployment, it appears that few federally funded employment and training programs are adequately designed for Hispanics. Moreover, those who develop such training have found that in the absence of adequate statistical documentation of the need for Hispanic programs, they have difficulty convincing state and local governments to adopt them. Thus...without comprehensive information on the extent and nature of Hispanic unemployment, "a fair and adequate distribution of program monies cannot be guaranteed among (the) Spanish background community." (from Improving Hispanic Unemployment Data: The Department of Labor's Continuing Obligation (1978), p.4.

2. Prime sponsors' determination of "significant segments" of the population who should be targeted to receive CETA services is neither consistent nor insures that persons in need of employment training are CETA recipients.

CETA regulations provide that planned service levels should be based on the composition of the eligible population. 8/ The criteria for determining the eligible population varies greatly among prime sponsors. One analyst has observed that CETA program planners have "relied too heavily on labor force status when planning training, job placement, and job creation programs, even though family economic status is far more important." 9/ The failure to focus on economic need in determining the eligible population can result in underservice of significant segments and target groups. For example, while one prime sponsor estimates that women make up 60% of the eligible population by economic criteria, it targets services to women at a lower rate because of their policy decision to "serve women in proportion to their representation in the local labor market." 10/

Many prime sponsor plans lack any description whatsoever of their method for determining priorities for services. This raises many queries concerning the method prime sponsors use

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8/ 20 CFR 676.54

9/ Sar Levitan "What Shall We Do For (or to) Our Youth in the 1980's?", reviewed in Employment and Training Reporter, January 16, 1980, p. 515.

10/ Sacramento California Prime Sponsor Master Plan, 1979.

to determine the composition of their area's CETA eligible population and whether population groups in need of CETA services actually receive them.

Among considerations that should be included in deciding needs for services to various groups are unemployment rates, incidence of "discouraged workers", poverty and wage levels, and education levels of target groups, weighted along with their numerical representation in the eligible population. By these criteria, most prime sponsors presently severely underrepresent the proportion of women and minorities in the eligible population.

While the CETA program ranking chart accompanying this report 11/ gives a general assessment of the extent to which prime sponsors meet or fail to meet planned service goals to Hispanics and women, it is likely that the underservice to these groups is even greater because of the failure of prime sponsors to accurately determine eligible populations. Therefore, it is difficult to assess how closely prime sponsors' planned goals match the actual needs of the disadvantaged community.

3. Prime sponsors' determination of CETA service levels to the eligible population is inconsistent, resulting in decreased services to Hispanics and women.

11/ See Ranking of Prime Sponsors, Appendix I of this report.

MALDEF found a significant inconsistency and variation among prime sponsors concerning their determination of service levels to target groups. When planning and developing employment and training opportunities, CETA regulations require that prime sponsors initially set planned service levels, taking into consideration the age, sex, race, and national origin composition of the eligible population. Many factors are taken into consideration when planning service levels to target groups. Persons most in need of CETA services within a program service area should ultimately by targeted by CETA prime sponsors for CETA services and have a service level goal set for the program year.[12/]

Our review found wide disparity among prime sponsors in their determination of service levels to target groups where minor fluctuations in the population would be expected. Uniformity in the female CETA eligible population, regardless of geographical area, might be expected to range from 40% - 60%; similarly, veterans are expected to be a stable population segment ranging from 5% - 10% of the eligible population. However, many prime sponsors seemingly overserved or underserved these groups without apparent justification. For example, veterans occupied 6% of CETA non-youth positions in one CETA program, [13/] while comprising

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12/ e.g., A prime sponsor determines that females, because of need, are a target group for services. If the eligibility of females for services in the geographical service area is high, the service level should reflect this by planning the service level accordingly. If the service level is set at 50% females for a particular CETA program, that program theoretically must enroll/place 50% females in its program.

13/ Imperial County, Ca. QSPC, 3rd qtr. 1979.

22% in another program; [14] women were identified as 60% or more of the eligible population in some programs [15] while targeted at less than 25% in other programs. [16] Such variations in planned service levels might very well be justified, however, prime sponsors rarely explained their reasoning for obvious underservice to women or Hispanics or overservice to the veteran population. Further, these disparities in planned service levels raises questions concerning prime sponsors' method of determining their goals, especially where goals for women and Hispanics appear to be excessively low.

4. Prime sponsors have failed to develop non-traditional training programs for women and have placed women in lower paying traditionally female occupations.

CETA regulations provide that all programs are to contribute to the elimination of sex stereotyping by recruiting members of one sex for training in occupations in which that sex represents less than 25% of the job holders. [17] However, a recent evaluation of CETA programs concluded that women who do get federally subsidized jobs/training are placed in lower paying traditionally

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14/ San Diego, Ca. QSPC, 3rd qtr. 1979.

15/ e.g. Kern County Master Plan 1979; Chicago, Ill. Master Plan 1979.

16/ e.g. City of Dallas Annual Plan (AP) 1979, set a goal of 25% women in their YCCIP program; likewise Cameron Co. Consortium (Tx.), at 22%; City of El Paso AP 1979 goal for women in Title VI was 15%.

17/ 20 CFR 676.52 et seq.

female occupations. In spite of "lip service" paid to training and placing women in non-traditional jobs little progress has been made in this direction. 18/

Most prime sponsor master and annual plans reviewed do not go beyond a general policy statement supporting the concept of non-traditional training. Studies indicate that strong positive recruitment actions are required to involve women in non-traditional areas and that merely informing women of non-traditional training programs does little to increase their enrollment. 19/ Clearly, prime sponsors must go beyond merely supporting the concept of non-traditional training if they are to have any real impact in improving the employment opportunities of women.

Women are consistently underenrolled in the CETA training programs that are most likely to provide non-traditional training or employment: Public Service Employment jobs under Titles IID and VI; Upgrading and Retraining Programs under Title IIC, Special target groups or Demonstration Programs under Title III and Skills Training Improvement Programs (STIP) have generally not succeeded in providing non-traditional opportunities for women.

18/ "The Subtle Revolution: Women at Work" (The Urban Institute, 1979) reviewed in Manpower and Vocational Education Weekly, September 27, 1979, pp. 7 - 8.

19/ HEW Study by Roslyn Kane and Pamela Frazee of Rj Associates, Inc. (1979) for the Bureau of Occupational and Adult Education.

Clearly, targeted recruitment is necessary for women in these CETA programs. A recent study of prime sponsor recruitment practices for Public Service Employment (PSE) positions under Titles IID and VI found that prime sponsors continued to rely principally on "walk-in" clients to fill PSE positions. 20/ The neediest populations are the least likely to respond to this type of recruitment technique. 21/ The study found that target recruitment engaged in was largely confined to veterans and welfare recipients through institutional channels. 22/ Prime sponsors must engage in active outreach and recruitment if they are to have impact in increasing women's participation and placement rates in existing CETA programs.

5. Prime sponsors underserve women and Hispanics in CETA Training and Public Service Employment Programs.

CETA regulations require that prime sponsors must provide employment and training opportunities on an equitable basis to significant segments of the eligible population. Significant segments are determined by sex, national origin, race or age group. Once service levels to a particular segment are planned

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20/ "The New CETA: Effect on Public Service Employment Programs", National Technical Information Services, 1979.

21/ For instance, studies indicate that Hispanics are less likely than other groups to utilize state employment offices, where many PSE jobs are posted.

22/ Op. cit. "The New CETA"

any overservice to a particular segment must be justified in the prime sponsor's Annual Plan. 23/ Where service levels to a significant segment differ by more than 15% from the levels set forth in the approved plan, DOL must require corrective action of any prime sponsor which is not able to adequately justify the variance. 24/

MALDEF found that every prime sponsor reviewed had failed to meet planned service levels for Hispanic and women's participation and/or placement services beyond the 15% variance allowed. Prime sponsors' failure to meet planned service levels ranged from a minimum of one program of six CETA program titles reviewed 25/ to failure to meet goals in all six CETA program titles. 26/ Further, the requirement that prime sponsors justify any 15% variance in their approved CETA plans is widely violated. Most prime sponsors' plans reviewed contained no justification for underservice beyond the 15% variance. Even where reasons are given, there are no guidelines or standards to assist in assessing whether the stated reasons for not meeting planned goals are justified. For example, one prime sponsor explains that it will "overserve males and underserve females in relation to the estimated percent of persons eligible in the area ...

23/ 20 CFR Section 676.54(b)

24/ 20 CFR Section 676.54(c)

25/ Colorado Balance of State CETA (including the Denver, Colorado area) only failed to meet one planned goal beyond the 15% variance allowed.

26/ San Francisco, California CETA program failed to meet planned goals for Hispanic or female participation and/or placement in all 6 program titles reviewed.

[because] many of the classroom training programs are offered in occupations historically held by men ..." [27] (emphasis added).

Clearly, DOL must engage in active monitoring of programs and enforcement of existing regulations to ensure prime sponsors do not underserve Hispanics and women in CETA programs.

6. Prime sponsors overserve veterans in CETA programs.

Our prime sponsor review found that veterans, as a target group, were heavily enrolled in the four CETA programs listing the highest wage rates after training was completed: Public Service Employment programs under Titles IID and VI, Special Target Group Programs under Title III and Skills Training Improvement Programs (STIP). Conversely, women, Hispanics and Persons of Limited English Speaking Ability (PLESA) are under-enrolled in these programs. [28] Veterans training and employment

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27/ Kern County CETA (Bakersfield, Ca.), Master Plan, p. 14.

28/ For example, there appears to be a marked tendency to underserve women (who comprise at least 50% of the eligible population) in programs which have high veteran enrollment (veterans comprise probably 5-10% of the eligible population) as in the following examples of CETA program participation/placement rates:

Prime Sponsor	Veterans Participation/ Placement	Females Participation Placement
Los Angeles Co. CETA	18%/22%	37%/35%
Kern Co. (CA) CETA	19%/25%	38%/41%
Arizona Balance of State (BOS) CETA	20%/33%	42%/27%
Monterey Co.(CA) CETA	19%/25%	49%/39%
Nevada Balance of State	27%/32%	48%/43%
Fresno (CA) CETA	19%/28%	44%/53%

programs are in preponderance in national special CETA programs funded under Title III. In California, veterans occupied 97% of the more than 5000 Title III (HIRE) placement slots in Fiscal Year 1979. Examining the enrollment in these programs revealed that Hispanics seem to be underenrolled considering the higher incidence of minorities and the higher unemployment rate of minorities in the veteran population. 29/ Further, veterans occupied over 12% of all California CETA positions (including programs for youth) though their representation in the eligible population is approximately half that rate.

Prime sponsors' willingness to target and overserve veterans is admirable, but raises many questions when compared to the chronic underservice of Hispanic and women's employment and training needs.

7. CETA and prime sponsors are not serving Persons of Limited English Speaking Ability

Although CETA regulations identify persons of limited English ability (PLESA) as a target group to be served, there is no definition of what constitutes a "PLESA" nor do most plans include a data base for assessing the population and needs of this target group. Thus, without uniform standards for assessing, identifying

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29/ The white and minority Vietnam era veterans' jobless rates differed widely, with the white rate at 4.6% and the minority rate at 12.5%, according to a government report, The Employment and Training Report of the President (1979) reviewed in Employment and Training Newsletter September 12, 1979, p. 7.

and serving the PLESA, prime sponsors may ignore the presence of PLESAs in their area because no data is available, or prime sponsors may opt to accept only those persons easiest to train in existing programs. The "creaming effect" as a result of such criteria may work directly against those most in need of CETA services because of their chronic unemployment due to limited English speaking ability.

MALDEF's review found very few prime sponsors even addressing the special needs of PLESAs in their Master or Annual Plans. Presently, persons who are monolingual or limited in English proficiency are unable to enter training programs because of the language barrier. Persons with higher English proficiency are more readily accepted into CETA programs because of their higher rate of successful completion of training. Further, English speaking trainees can be trained at lower cost and within a shorter period of time than PLESAs which is highly attractive to prime sponsors.

MALDEF surveyed several Texas CETA subcontractors who provided specialized training to PLESAs. These subcontractors supported the position that "quality not quantity" criteria for CETA training should be implemented by prime sponsors when developing programs for PLESAs. Further, a longer training period and bilingual instruction for the PLESA at various levels of English proficiency is suggested as a feasible method of serving this target group.

8. Prime sponsors' political and economic biases in determining program focus is disadvantageous to Hispanics and women.

Where prime sponsors lack adequate data to determine the training and employment needs of significant segments, 30/ additional weight is likely to be given to political and economic considerations. Our assessment is that these considerations are likely to work against quality CETA services for women and Hispanics.

The structure of CETA gives wide discretion to the local planning body known as the Employment and Training Advisory Council (ETAC). The ETAC recommends to prime sponsors which programs to fund. While CETA guidelines outline generally various groups to be represented on the local ETAC, the members are usually appointed by local politicians. Generally, women were severely underrepresented on all the ETACs and Hispanics were underrepresented on the majority of ETACs reviewed by MALDEF. 31/ Thus, if decisions were made on a purely political basis, women and minorities could be expected to be at a disadvantage in the decision making structure.

30/ For example, prime sponsors frequently lack and fail to develop data for the limited English speaking or displaced homemakers in their service area.

31/ It should be noted that veterans, as a group, were well represented on the ETACs reviewed.

Economic considerations are also likely to influence the type of program developed by prime sponsors. Most prime sponsors' program evaluation criteria work directly against those most in need of services and covertly encourage a "creaming" effect, favoring those who are easiest to train. For example, one prime sponsor outlines a typical set of criteria for assessing the funding of proposals and programs as: "component utilization and completion rates, placement rates, retention rates, and changes in wages after training ... comparing indices such as cost per placement, costs of serving alternative target groups, and actual with planned costs per unit of service." (emphasis added) [32/]

Prime sponsors' utilization of these factors may work to eliminate training and employment programs directed at PLESAs and other groups with special service needs, work against developing relatively high cost, high quality programs in favor of teaching simple tasks in large short-term programs, and discourage new, experimental, or innovative programs whose start-up costs must compete with established traditional program service delivery.

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32 Kern County (Ca) CETA, Master Plan

RECOMMENDATIONS

MALDEF makes the following recommendations with regard to CETA programs based on insufficiencies of the targeted prime sponsors noted in our review:

Data Bases:

-- Participant characteristics should be broken down by race and sex.

-- "PLESA" should be centrally defined by DOL.

-- Prime sponsors should determine the eligible PLESA population in their area in order to plan CETA programs for this group.

-- Data bases justifying service levels to veterans should be included in prime sponsor plans.

-- DOL should provide technical assistance to update and supplement census data.

-- Hispanic unemployment rates should be available and considered when determining target group needs.

Target Groups and Significant Segments:

-- Prime sponsors need more guidelines on selection methods for determining target populations to receive CETA services.

-- Prime sponsors need to document that their planned goals for services match the actual needs of the disadvantaged community.

Non-traditional training:

-- Prime sponsors must determine which occupations are sex stereotyped (i.e. enroll less than 25% of one sex) and provide active recruitment programs for the enrollment of the underrepresented sex. Their progress must be assessed by DOL on a quarterly basis.

-- Target recruitment of women and Hispanics needs to be improved to ameliorate their underenrollment, especially in Titles IIB and C, III, STIP, and Title VI.

-- Prime sponsors must address and justify in their CETA Plans overservice or underservice to significant segments and target groups.

Services to Veterans:

-- Title III national special program funds should be expanded to include a wider variety of target groups other than veterans.

-- Actual service needs of veterans should be assessed in prime sponsor plans. Justification should be provided for overservice to veterans in comparison with other target groups.

-- Minority veterans must receive equitable services within veterans programs.

Economic/Political:

-- Equitable representation of women and Hispanics on ETACs must be achieved.

-- Tests used by CETA programs to screen participants must be related to the training and not serve to screen out PLESAs and other groups unable to meet overly stringent requirements.

-- DOL should closely monitor prime sponsors and take actions to correct underservice or overservice to significant segments if actual service levels are in excess of the 15% variance allowed.

-- Management Information Systems presently favor quantifiable data. Evaluative measures must also be developed that will not screen out high quality and innovative programs which serve important segments of target populations.

CONCLUSION

MALDEF found wide disparities in the administration and quality of CETA programs in the 30 prime sponsors reviewed. As the charts which follow indicate, prime sponsors have largely failed to meet their own planned goals for Hispanics and women in program participation and employment placement. The Department of Labor (DOL) has a duty to investigate violators of the 15% variance requirement to insure that significant segments receive the services they deserve under the CETA program. Further, prime sponsor planning councils (ETAC) must be brought into compliance with regulatory requirements concerning the participation of women and Hispanics. DOL should not continue to disperse millions of dollars each fiscal year to programs that provide inequitable services to Hispanics and women.

APPENDIX I

Prime Sponsor Ranking on Basis of Unmet Enrollment in Excess of 15% Variance/and Hispanic and Female Representation on ETACs.

The following tables on the 30 targeted Prime Sponsors reviewed in this report rank the programs using the following standards:

1) Whether prime sponsors failed to meet their own planned service levels to Hispanics and women in six CETA Program Titles beyond the 15% variance allowed in the CETA regulations. *

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* Methodological Note - Computing 15% Variance in Determining Unmet Goals:

MALDEF used the following methodology in determining whether a prime sponsor was in compliance with the 15% allowance using service levels contained in the Prime Sponsor's Quarterly Summary of Participant Characteristics (Fiscal Year 1979):

(1) Determine what the fiscal year percentage goal for the significant segment is for each title; i.e. 30% for Hispanics in Title IIB;

(2) Determine the numerical goal for the significant segment based on the total number of participants, i.e. N=1500, 1500 x 30% = 450;

(3) Determine the actual number of the significant segment divided by the numerical goal, i.e. Hispanic = 320 ÷ 450 = 71%;

(4) Subtract 71% from 100% to determine the percent yet to be achieved toward the goal, i.e. 100% - 71% = 29%. This particular service level is over the 15% variance allowed and would be in non-compliance with CETA regulations.

2) Whether prime sponsors had adequate Hispanic and female representation on their ETACs considering these groups' representation in the CETA eligible participation.*

The tables rank the prime sponsors beginning with the programs in least compliance with meeting their own planned service goals.

Further, the composition of prime sponsors' ETACs is indicated on the right hand column; those prime sponsors who had insufficient Hispanic and/or female representation received marks in this column.

CAVEAT:

These charts reflect only unmet planned goals. It does not reflect the problem of prime sponsor goal setting for

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* Methodological Note - Computing ETAC Compliance:

MALDEF used the following methodology in determining whether a prime sponsor's ETAC had sufficient female and Hispanic representation:

(1) Determine the total number of ETAC members (excluding vacancies);

(2) Determine the total number of female and Hispanic members on the ETAC;

(3) Determine the percent of CETA eligible female and Hispanic population in the Master Plan;

(4) Compare the eligible population percentage to the significant representation percentage of the ETAC;

(5) If the percentages match, the ETAC is in compliance; if the segment population falls short of the eligible population percentage a determination of noncompliance was made if one additional segment member would still not place the ETAC in compliance.

Hispanics and women. The main body of this report has discussed the problem of data bases and determining the needs of target populations and significant segments. Some prime sponsors set unreasonably low goals that are easily attainable, either consciously or due to underestimates of the eligible segments. Also, the chart does not address program quality, so that a prime sponsor may have an adequate level of female enrollment, but have them enrolled in traditional, short-term, low-cost training in high numbers while reserving the smaller, high-cost-per placement programs for males. The chart should be viewed as measuring one aspect of the problem, not the whole problem.

SUMMARY OF PRIME SPONSOR RANKING

RANK	SPONSOR	TOTAL UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE	ETAC MEMBERSHIP NON-COMPLIANCE	
			FEMALE	HISPANIC
1.	Toledo, Ohio	11	X	
2.	San Francisco, California	10	X	X
3.	Fort Worth, Texas	10	X	
	Houston, Texas	10	X	
	Sacramento, California	10	X	X
4.	Dallas, Texas	9	X	X
5.	Chicago, Illinois	9	X	
6.	Los Angeles, California (city)	7	X	X
	Del Rio, Texas (Middle Rio Grande)	7	X	X
7.	Midland, Texas (Permian Basin Region)	6	X	X
8.	San Diego, California	6	X	
9.	Stockton, California	5	X	X
10.	Brownsville, Texas (Cameron County)	5	X	
	El Paso, Texas	5	X	
	El Centro, California (Imperial County)	5	X	X
	Bakersfield, California (Kern County)	5	X	
	Waco, Texas	5	X	
11.	Corpus Christi, Texas (Coastal Bend Consortium)	4	X	X
	Edinburg, Texas (Hidalgo County)	4	X	X
	Salinas, California (Monterey County)	4	X	X

SUMMARY OF PRIME SPONSOR RANKING

RANK	SPONSOR	TOTAL UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE	ETAC MEMBERSHIP NON-COMPLIANCE	
			FEMALE	HISPANIC
12.	Laredo, Texas (Webb County)	4	X	
	Las Vegas, Nevada (Clark County Consortium)	4	X	
	San Jose, California (Santa Clara Valley)	4	X	X
13.	Carson City, Nevada - Balance of State (BOS)	3	X	
	Phoenix, Arizona - Balance of State (BOS)	3	X	X
14.	Fresno, California	3	X	X
15.	Visalia, California (Tulare County)	2	X	X
16.	Los Angeles, California (County)	2	X	
	Colton, California (Inland Manpower Assn.)	2	X	
17.	Denver, Colorado (Balance of State(BOS)	1	X	X

TABLE: UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE
FEMALES & HISPANICS

RANK	SPONSOR	TARGET GROUP	PROGRAM TITLES* IIB	IID	YCCIP	YETP	SYEP	VI	TOTAL UNMET GOALS	ETAC MEMBERSHIP IN NON-COMPLIANCE
1.	Toledo, Ohio Employment and Training	FEMALES								X
		Participation			X					
		Entered Employment	X		X			X		
		HISPANICS							11	
		Participation	X	X		X		X		
		Entered Employment	X	X		X				
2.	San Francisco, Ca. Mayor's Office of Employment and Training	FEMALES								X
		Participation	X		X					
		Entered Employment	X		X					
		HISPANICS							10	X
		Participation		X		X	X	X		
		Entered Employment		X				X		
3. (tie)	Ft. Worth, Texas, City of Ft. Worth Employment and Training	FEMALES								X
		Participation			X					
		Entered Employment			X		X			
		HISPANICS							10	
		Participation		X			X	X		
		Entered Employment		X	X		X	X		
3. (tie)	Houston, Texas Office of the Mayor	FEMALES								X
		Participation		X	X		X	X		
		Entered Employment		X	X		X			
		HISPANICS							10	
		Participation			X					
		Entered Employment			X	X				

* See Appendix III for description of program titles

TABLE: UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE
FEMALES & HISPANICS

RANK	SPONSOR	TARGET GROUP	PROGRAM TITLES IIB	IID	YCCIP	YETP	SYEP	VI	TOTAL UNMET GOALS	ETAC MEMBERSHIP IN NON-COMPLIANCE
3. (tie)	Sacramento, Ca. Sacramento Employment and Training	FEMALES								X
		Participation			X				10	
		Entered Employment			X			X		
		HISPANICS								X
		Participation	X	X	X			X		
		Entered Employment	X	X				X		
4.	Dallas, Tx. Office of Human Development	FEMALES								X
		Participation	X		X				9	
		Entered Employment			X					
		HISPANICS								X
		Participation		X	X	X		X		
		Entered Employment			X			X		
5.	Chicago, Ill. Mayor's Office of Employment and Training	FEMALES								X
		Participation			X			X	9	
		Entered Employment			X			X		
		HISPANICS								
		Participation		X			X	X		
		Entered Employment		X				X		
6.	Los Angeles, Ca. City of Los Angeles Training and Job Development	FEMALES								X
		Participation			X				7	
		Entered Employment			X					
		HISPANICS								X
		Participation	X				X	X		
		Entered Employment	X	X						

TABLE: UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE
FEMALES & HISPANICS

RANK	SPONSOR	TARGET GROUP	PROGRAM TITLES IIB	IID	YCCIP	YETP	SYEP	VI	TOTAL UNMET GOALS	ETAC MEMBERSHIP IN NON-COMPLIANCE
6. (tie)	Del Rio, Tx. Middle Rio Grande Development Council	FEMALES								X
		Participation		X	X			X	7	
		Entered Employment	X	X	X			X		
		HISPANICS								X
		Participation								
		Entered Employment								
7.	Midland, Tx. Permian Basin Regional Planning Commission	FEMALES								X
		Participation			X				6	
		Entered Employment			X		X	X		
		HISPANICS								X
		Participation						X		
		Entered Employment						X		
8.	San Diego, Ca. San Diego Regional Employment and Training Consortium	FEMALES								X
		Participation			X				6	
		Entered Employment			X					
		HISPANICS								
		Participation		X				X		
		Entered Employment		X				X		
9.	Stockton, Ca. City of Stockton Employment and Training Opportunities	FEMALES								X
		Participation			X				5	
		Entered Employment		X	X					
		HISPANICS								X
		Participation		X						
		Entered Employment		X						

TABLE: UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE
FEMALES & HISPANICS

RANK	SPONSOR	TARGET GROUP	PROGRAM TITLES: IIB	IID	YCCIP	YETP	SYEP	VI	TOTAL UNMET GOALS	ETAC MEMBERSHIP IN NON-COMPLIANCE
10. (tie)	Brownsville, Tx. Cameron County Resources and Community Affairs	FEMALES							5	X
		Participation						X		
		Entered Employment		X	X	X		X		
		HISPANICS								
		Participation								
		Entered Employment								
10. (tie)	El Paso, Tx. Dept. of Human Resources, City and County Consortium	FEMALES							5	X
		Participation			X			X		
		Entered Employment		X	X			X		
		HISPANICS								
		Participation								
		Entered Employment								
10. (tie)	El Centro, Ca. Imperial County CETA Services	FEMALES							5	X
		Participation								
		Entered Employment				X				
		HISPANICS								X
		Participation	X	X						
		Entered Employment	X	X						
10. (tie)	Bakersfield, Ca. Kern County CETA	FEMALES							5	X
		Participation			X					
		Entered Employment			X					
		HISPANICS								
		Participation		X						
		Entered Employment		X		X				

TABLE: UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE
FEMALES & HISPANICS

RANK	SPONSOR	TARGET GROUP	PROGRAM TITLES IIB	IID	YCCIP	YETP	SYEP	VI	TOTAL UNMET GOALS	ETAC MEMBERSHIP IN NON-COMPLIANCE
10. (tie)	Waco, Tx. Region II Consortium	FEMALES								X
		Participation			X		X			
		Entered Employment			X	X	X		5	
		HISPANICS								
		Participation								
		Entered Employment								
11. (tie)	Corpus Christi, Tx. Coastal Bend Consortium	FEMALES								X
		Participation			X					
		Entered Employment	X	X	X				4	
		HISPANICS								X
		Participation								
		Entered Employment								
11. (tie)	Edinburg, Tx. County of Hidalgo Dept. of Community Affairs	FEMALES								X
		Participation			X			X		
		Entered Employment			X			X	4	
		HISPANICS								X
		Participation								
		Entered Employment								
11. (tie)	Salinas, Ca. Monterey County CETA Admin. Div.	FEMALES								X
		Participation			X	X				
		Entered Employment			X	X			4	
		HISPANICS								X
		Participation								
		Entered Employment								

TABLE: UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE
FEMALES & HISPANICS

RANK	SPONSOR	TARGET GROUP	PROGRAM TITLES IIB	IID	YCCIP	YETP	SYEP	VI	TOTAL UNMET GOALS	ETAC MEMBERSHIP IN NON-COMPLIANCE
12. (tie)	Laredo, Tx. Webb County Manpower Programs	FEMALES								X
		Participation			X					
		Entered Employment		X	X			X		
		HISPANICS							4	
		Participation								
		Entered Employment								
12. (tie)	Las Vegas, Nv. Las Vegas - Clark County Consortium	FEMALES								X
		Participation								
		Entered Employment								
		HISPANICS							4	
		Participation			X		X			
		Entered Employment		X	X					
12. (tie)	San José, Ca. Santa Clara Valley Employment and Training Board	FEMALES								X
		Participation				X				
		Entered Employment				X				
		HISPANICS							4	X
		Participation								
		Entered Employment			X	X				
13. (tie)	Carson City, Nv. Balance of State, Nevada Employment Security Dept.	FEMALES								X
		Participation								
		Entered Employment								
		HISPANICS							3	
		Participation			X					
		Entered Employment			X			X		

TABLE: UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE
FEMALES & HISPANICS

RANK	SPONSOR	TARGET GROUP	PROGRAM TITLES IIB	IID	YCCIP	YETP	SYEP	VI	TOTAL UNMET GOALS	ETAC MEMBERSHIP IN NON-COMPLIANCE
13. (tie)	Phoenix, Az. Arizona Balance of State	FEMALES								X
		Participation			X					
		Entered Employment			X			X		
		HISPANICS							3	X
		Participation								
		Entered Employment								
14.	Fresno, Ca. Fresno Employment and Training Com.	FEMALES								X
		Participation								
		Entered Employment				X				
		HISPANICS							3	X
		Participation		X						
		Entered Employment			X					
15.	Visalia, Ca. Tulare County Human Service Employment and Training	FEMALES								X
		Participation			X					
		Entered Employment			X					
		HISPANICS							2	X
		Participation								
		Entered Employment								
16. (tie)	Los Angeles County, Ca. Dept. of Community Development of Los Angeles County	FEMALES								X
		Participation			X					
		Entered Employment			X					
		HISPANICS							2	
		Participation								
		Entered Employment								

TABLE: UNMET ENROLLMENT/PLACEMENT GOALS IN EXCESS OF 15% VARIANCE
FEMALES & HISPANICS

RANK	SPONSOR	TARGET GROUP	PROGRAM TITLES IIB	IID	YCCIP	YETP	SYEP	VI	TOTAL UNMET GOALS	ETAC MEMBERSHIP IN NON-COMPLIANCE
16. (tie)	Colton, Ca. Inland Manpower Association	FEMALES								X
		Participation			X					
		Entered Employment			X					
		HISPANICS							2	
		Participation								
		Entered Employment								
17.	Denver, Co. Colorado Balance of State CETA Dept. of Labor and Employment	FEMALES								X
		Participation			X					
		Entered Employment								
		HISPANICS							1	X
		Participation								
		Entered Employment								

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APPENDIX II

The following is a list of CETA Prime Sponsors reviewed in this report.

TARGETED CETA PROGRAMS

ARIZONA

1. Arizona Department of Economic Security
   Balance of State CETA Programs
   1717 West Jefferson
   P.O. Box 6123
   Phoenix, Arizona 85005
   (602) 255-3957
   William S. Jamieson, Jr., Director

CALIFORNIA

2. Fresno Employment and Training Commission
   1404 L Street
   Fresno, California 93721
   (209) 485-5670
   Lupe de la Cruz, Executive Director

3. Imperial County CETA Services
   640 State Street
   El Centro, California 92243
   (714) 352-3610 x 365
   Mary Rangel, Administrator

4. Inland Manpower Association
   336 N. La Cadena Drive
   P.O. Box 350
   Colton, California 92324
   (714) 824-2500
   Frank Martinez, Director

5. Kern County CETA
   1037 17th Street
   Bakersfield, California 93301
   (805) 861-2095
   Tim E. Christensen, Director

6. City of Los Angeles Training and Job Development
   207 S. Broadway, Room 600
   Los Angeles, California 90012
   (213) 485-5019
   Lillian Millard, Director

7. County of Los Angeles
   Department of Community Development
   3175 W. Sixth Street
   Los Angeles, California 90020
   (213) 738-2611
   Donald G. Galloway, Director

8. Monterey County
CETA Administration Division
P.O. Box 2183
Salinas, California 93902
(408) 424-0972
Diane Skidmore, Director

9. Sacramento Employment and Training Agency
2020 J Street
Sacramento, California 95814
(916) 447-6961

10. City and County of San Francisco
Employment and Training
1453 Mission Street, 3rd Floor
San Francisco, California 94103
(415) 558-2922
Eunice Elton, Director

11. San Diego Regional Employment and Training Consortium
861 Sixth Avenue
P.O. Box 2072
San Diego, California 92112
(714) 238-1445
Michael Jaffa, Acting Executive Director

12. Santa Clara Valley Employment and Training Board
33 East San Fernando Street
San Jose, California 95113
(408) 277-4277
Daniel Campos, Executive Director

13. City of Stockton
Employment and Training Opportunities
City Hall
Stockton, California 95202
(209) 944-8277
George Moton, Director

14. Tulare County Human Services
Employment and Training
113 N. Church Street, 3rd Floor
Visalia, California 93277
(209) 625-9222
Robert N. Scott, Director

COLORADO

15. Department of Labor & Employment
Balance of State/CETA
1200 Lincoln, Suite 620
Denver, Colorado 80205
(303) 861-0514
Robert J. Cre, Executive Director

ILLINOIS

16. Mayor's Office of Employment and Training
180 N. La Salle Street, Suite 800
Chicago, Illinois 60601
(312) 744-7853
Samuel C. Bernstein, Assistant to the Mayor
Employment & Training

NEVADA

17. Nevada Employment & Security Department
500 East Third Street
Carson City, Nevada 89701
Lawrence O. McCracken, Executive Director

18. Las Vegas Clark County Consortium
Department of Human Resources
935 E. Sahara Avenue, Suite 250
Las Vegas, Nevada 89104
(702) 733-9950
Ernest E. Bryant, Executive Director

OHIO

19. Toledo Area CETA Consortium
Employment and Training Administration
1100 Jackson Street
Toledo, Ohio 43624
(419) 247-6581
Daniel E. Hiskey, Administrator

TEXAS

20. Cameron County Employment and Training
1150 E. Madison Street - Courthouse
Brownsville, Texas 78520
(512) 542-4351
Jose Noe Diaz, Executive Director

21. Coastal Bend Consortium
CETA Program
P.O. Box 9277
Corpus Christi, Texas 78408
(512) 884-3011 x 287
Juan Bosquez, Director

22. Office of Human Development
CETA Program
2014 E. Main Street, # 506
Dallas, Texas 75201
(214) 670-3705
Stanley H. Scott, Ph.D., Director

23. Middle Rio Grande Development Council
CETA Program
1915 Avenue F
P.O. Box 1461
Del Rio, Texas 78840
(512) 775-1581
Alfredo R. Delgado, Director of Manpower Services

24. County of Hidalgo
Department of Community Affairs
1212 South 25th
P.O. Box 1166
Edinburg, Texas 78539
(512) 383-0181
Ramon Chapa, Acting Executive Director

25. Department of Human Resources
City of El Paso CETA Manpower Program
8929 Viscount
El Paso, Texas 79925
(915) 591-2700
Mario Sanchez, Director

26. Employment and Training Programs
City of Ft. Worth
1000 Throckmorton Street
Ft. Worth, Texas 76102
(817) 926-1745
Jim Wood, Director

27. City of Houston
Office of the Mayor
CETA Programs Division
401 Louisiana, Suite 700
Houston, Texas 77002
(713) 222-5147
Thomas Brown, Acting Director

28. Permian Basin Regional Planning Commission
P.O. Box 6391
Midland, Texas 79701
(915) 563-1061
Willie Taylor, Director

29. Webb County Manpower Programs
4217 N. Bailett
P.O. Box 1757
Laredo, Texas 78041
(512) 722-3973
Horacio Acevedo, Executive Director

30. Region II Consortium
City of Waco Employment and Training Division
P.O. Box 1370
Waco, Texas 76703
(817) 756-6161
Bill Roberts, Director

APPENDIX III

Abbreviations/Acronyms used in this report:

BOS - Balance of State

CETA - Comprehensive Employment and Training Act

DOL - Department of Labor

ETAC - Employment and Training Advisory Council

PLESA - Person of Limited English Speaking Ability

PSE - Public Service Employment (CETA funded programs under Titles IID and VI)

SMSA - Standard Metropolitan Statistical Area

STIP - Skills Training Improvement Program

SYEP - Summer Youth Employment Program or
or
SPEDY - Summer Program for Economically Disadvantaged Youth

YCCIP - Youth Community Conservation and Improvement Program

YETP - Youth Employment and Training Program

Title IIB - Includes classroom job training, on-the-job training and work experience programs.

Title IID and Title VI - Public Service Employment - jobs designed to give experience and promote upward mobility by employing eligible persons in public or community based (private, non-profit) organizations.

Title III - Funds for special youth and target group programs, as well as national demonstration programs, research and evaluation.